Southern Nuclear

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Southern Nuclear Operating Company
Vogtle Electric Generating Plant Unit 4
ITAAC Closure Notification on Completion of ITAAC C.2.6.09.09 [Index Number 670]

Ladies and Gentlemen:

In accordance with 10 CFR 52.99(c)(1), the purpose of this letter is to notify the Nuclear Regulatory Commission (NRC) of the completion of Vogtle Electric Generating Plant (VEGP) Unit 4 Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item C.2.6.09.09 [Index Number 670]. This ITAAC confirms that emergency exits through the protected area perimeter are alarmed and secured by locking devices that allow prompt egress during an emergency. The ITAAC also confirms that emergency exits through the vital area boundaries are locked, alarmed, and equipped with a crash bar to allow for emergency egress. The closure process for this ITAAC is based on the guidance described in Nuclear Energy Institute (NEI) 08-01, “Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52,” which was endorsed by the NRC in Regulatory Guide 1.215.

This letter contains no new NRC regulatory commitments. Southern Nuclear Operating Company (SNC) requests NRC staff confirmation of this determination and publication of the required notice in the Federal Register per 10 CFR 52.99.

If there are any questions, please contact Kelli Roberts at 706-848-6991.

Respectfully submitted,

Jamie Coleman

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Regulatory Affairs Director Vogtle 3 & 4

Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 4
Completion of ITAAC C.2.6.09.09 [Index Number 670]

JMC/SRV/sfr

cc: Regional Administrator, Region ll
Director, Office of Nuclear Reactor Regulation (NRR)
Director, Vogtle Project Office NRR
Senior Resident Inspector – Vogtle 3 & 4

Southern Nuclear Operating Company
ND-23-0126
Enclosure

Vogtle Electric Generating Plant (VEGP) Unit 4
Completion of ITAAC C.2.6.09.09 [Index Number 670]

ITAAC Statement

Design Commitment

9. Emergency exits through the protected area perimeter are alarmed and secured with locking devices to allow for emergency egress.

9. Emergency exits through the vital area boundaries are locked, alarmed, and equipped with a crash bar to allow for emergency egress.

Inspections/Tests/Analyses

Tests, inspections, or a combination of tests and inspections of emergency exits through the protected area perimeter will be performed.

Test, inspection, or a combination of tests and inspections of the emergency exits through the vital area boundaries will be performed.

Acceptance Criteria

Emergency exits through the protected area perimeter are alarmed and secured by locking devices that allow prompt egress during an emergency.

The emergency exits through the vital area boundaries are locked, alarmed, and equipped with a crash bar to allow for emergency egress.

ITAAC Determination Basis

Tests of the emergency exits through the protected area perimeter and through the vital area boundaries were performed to verify that each emergency exit through the protected area perimeter is alarmed and secured by a locking device that allows prompt egress during an emergency, and the emergency exits through the vital area boundaries are locked, alarmed, and equipped with a crash bar to allow for emergency egress. The VEGP Unit 4 Plant Security System ITAACs only cover the Unit 4 plant security system design commitment scope.

Emergency exits through the protected area perimeter are alarmed and secured by locking devices that allow prompt egress during an emergency.

Testing was performed as described in ITAAC Technical Report SV3-SES-ITR-800670 (Reference 3) to verify that each emergency exit portal through the protected area perimeter is alarmed and secured by a locking device that allows prompt egress during an emergency and satisfies the applicable protected area perimeter emergency egress requirements of the VEGP Unit 3 and Unit 4 Physical Security Plan associated with 10 CFR 73.55(e)(8)(iii). All emergency exits through the protected area perimeter are captured in Reference 3 since Unit 3 and Unit 4 share a protected area perimeter.

The test for each protected area perimeter emergency exit portal first verified the protected area perimeter emergency exit portal was secured by a locking device. The protected area perimeter emergency exit portal was then unlocked by releasing the lock and opening the portal door, and then verifying that an associated alarm was generated in the central alarm station (CAS) and the secondary alarm station (SAS). Once unlocked it was confirmed that the protected area perimeter emergency exit portal allowed prompt egress. The protected area perimeter emergency exit portal was then secured by a locking device i.e., lock restored and portal door closed, and it was verified that the associated alarm in the CAS and SAS could be reset.

The results of the test are documented in Reference 3 and verify each emergency exit through the protected area perimeter is alarmed and secured by a locking device that allows prompt egress during an emergency.

The emergency exits through the vital area boundaries are locked, alarmed, and equipped with a crash bar to allow for emergency egress.

Testing was performed as described in ITAAC Technical Report SV4-SES-ITR-800670 (Reference 1) to verify that the emergency exits through the vital area boundaries are locked, alarmed, and equipped with a crash bar to allow for emergency egress and satisfy the applicable vital area boundary emergency egress requirements of the VEGP Unit 3 and Unit 4 Physical Security Plan associated with 10 CFR 73.55(e)(9)(ii).

The test for each vital area boundary emergency exit portal first verified the vital area boundary emergency exit portal was locked. The vital area boundary emergency exit portal was then exited using the portal's crash bar, and verification made that an associated alarm was generated in the CAS and SAS. The vital area boundary emergency exit portal was then closed and locked, and verification made that the associated alarm in the CAS and SAS could be reset.

The results of the test are documented in Reference 1 and verify the emergency exits through the vital area boundaries are locked, alarmed, and equipped with a crash bar to allow for emergency egress.

References 1 and 3 are available for NRC inspection as part of the Unit 4 ITAAC C.2.6.09.09 Completion Package (Reference 2).

ITAAC Finding Review

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all findings pertaining to the subject ITAAC and associated corrective actions. This review found there were no relevant ITAAC findings associated with this ITAAC. The ITAAC completion review is documented in the ITAAC Completion Package for ITAAC C.2.6.09.09 (Reference 2) and is available for NRC review.

ITAAC Completion Statement

Based on the above information, SNC hereby notifies the NRC that ITAAC C.2.6.09.09 was performed for VEGP Unit 4 and that the prescribed acceptance criteria were met.

Systems, structures, and components verified as part of this ITAAC are being maintained in their as-designed, ITAAC compliant condition in accordance with approved plant programs and procedures.

References (available for NRC inspection)

1. SV4-SES-ITR-800670, Protected Area Perimeter and Vital Area Boundary Emergency Exit Test, Rev 0 (SRI)
2. C.2.6.09.09-U4-CP-Rev0, ITAAC Completion Package
3. SV3-SES-ITR-800670, Protected Area Perimeter and Vital Area Boundary Emergency Exit Test, Rev 0 (SRI)